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November 7, 2018

By ECF

Honorable Peggy Kuo
U.S. District Court Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 1120

RE: *Government Employees Insurance Company et al. v. A.R.A Medical Care, P.C. et al*
Docket No.: 1:18-CV-02852 (JBW)(PK)

Dear Magistrate Judge Kuo:

This firm represents Plaintiffs (collectively, "GEICO") in the above-referenced action. We submit this joint status report pursuant to the Court's Order of October 30, 2018, and on behalf of GEICO and Defendants Svetlana Khotenok a/k/a Lana Trotman, A.R.A Medical Care, P.C., Suhel Hussain Ahmed, M.D., Ahmed Medical Care, P.C., Shaikh Jauhar Ahmed, M.D., Horizon PT Care, P.C., Hands On Physical Therapy Care, P.C., Mohamed Hassan Ali Attiya, P.T., Top Tap Acupuncture, P.C., Jubilee Star Acupuncture, P.C., Lily Jou, L.Ac., BNL Acupuncture, P.C. and Run Hong Li, L.Ac. (collectively, "Certain Defendants").

At this time, though GEICO and Certain Defendants have reached a settlement agreement, Defendant Suhel Hussain Ahmed, M.D. ("Defendant Ahmed") has failed to comply with the terms and conditions necessary to finalize the agreement and for GEICO to file stipulations of dismissal. While Defendant Ahmed has represented that compliance is imminent, to-date he has not fulfilled his obligations under the agreement, nor he has proffered any excuse for his failure to timely do so.

GEICO respectfully reminds the Court that GEICO and Certain Defendants first reached a settlement in principle in September 2018, and advised the Court as such on September 12, 2018. Since then, the Court has granted three extensions of time for Certain Defendants to finalize the settlement agreement so that GEICO may file stipulations of dismissal. Despite these extensions, and GEICO's due diligence in attempting to comply with the Court's orders, Defendant Ahmed has failed to fulfill his obligations under the agreement. As such, GEICO respectfully requests that, to the extent Defendant Ahmed has not fulfilled his obligations under the agreement by Monday, November 12, 2018, the Court schedule a conference requiring

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Defendant Ahmed to appear in person to explain why he is unable to comply with the terms and conditions of the agreement.

We appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

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Enc.

cc: All counsel via ECF